

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JACKSON NATIONAL LIFE
INSURANCE COMPANY,

Plaintiff and
Counterclaim Defendant,

v.

STERLING CRUM,

Defendant and
Counterclaim Plaintiff.

CIVIL ACTION

NO. 1:17-CV-3857-WMR

CONSENT NOTICE OF FILING TRIAL EXHIBITS

Plaintiff/Counterclaim Defendant Jackson National Life Insurance Company, with Defendant/Counterclaim Plaintiff Sterling Crum's consent, submits this notice of filing the exhibits admitted during the bench trial starting on August 27, 2019 in the above-styled civil action.

| <u>Exhibit No.</u> | <u>Admitted Trial Exhibit No.</u> | <u>Description</u> |
|-------------------------------|--|--|
| 1 | D-05 | October 22, 1998 Letter to Midland and Enclosures |
| 2 | D-14 | Feb 2001 Letter from Midland to Crum Re Premium Payment & Check Making Payment |
| 3 | D-19 | Couch Birth Certificate |

| <u>Exhibit No.</u> | <u>Admitted Trial Exhibit No.</u> | <u>Description</u> |
|---------------------------|--|--|
| 4 | D-20 | Couch Death Certificate |
| 5 | D-30 | Grady Medical Records and Authenticating Affidavit <i>(filed separately under seal)</i> |
| 6 | D-32 | Affidavit of Infectious Disease Services of Georgia, P.C. |
| 7 | D-36 | Midland Amendment Notification and Statement of Insured Personal Health |
| 8 | J-01 | Application |
| 9 | J-02 | Notice and Consent Form - HIV Testing |
| 10 | J-03 | Lab Results Midland Health Examiners <i>(filed separately under seal)</i> |
| 11 | J-04 | Policy |
| 12 | J-05 | Policy Summary |
| 13 | J-06 | Broker Agr 8.31.99 |
| 14 | J-07 | Beneficiary Ownership Change Form |
| 15 | J-08 | September 22, 1999 Letter from Midland Confirming Change of Beneficiary |

| <u>Exhibit No.</u> | <u>Admitted Trial Exhibit No.</u> | <u>Description</u> |
|---------------------------|--|--|
| 16 | J-09 | Copy of Couch Driver's License and Social Security Card |
| 17 | J-10 | May 15, 2000 Letter to Midland with Premium Payment through January 2001 |
| 18 | J-11 | Premium Payment Letter to Reassure |
| 19 | J-12 | Couch Death Certificate |
| 20 | J-13A | March 17, 2017 Claim for Policy Benefit |
| 21 | J-13B | Claim for Policy Benefit |
| 22 | J-14A | Jan-April 2017 Letters from Jackson Re Claim Info |
| 23 | J-14B | Jan-Apr 17 Letters from Jackson Re Claim Info |
| 24 | J-15A | 4.5.17 Letter from Jackson Denying Coverage & Benefits |
| 25 | J-15B | 4.5.17 Letter from Jackson Denying Coverage & Benefits |
| 26 | J-16A | May 2017 letters from Jackson re claim review |
| 27 | J-16B | May 2017 Letters from Jackson re claim review |
| 28 | J-17 | June 8-9 2017 Letter & Fax to Jackson re Jantos |
| 29 | J-18 | 6.9.17 Letter to Jackson enc Crum ID Docs |
| 30 | J-19 | 6.14.17 Letter from Jackson re Additional Info |

| <u>Exhibit No.</u> | <u>Admitted Trial Exhibit No.</u> | <u>Description</u> |
|---------------------------|--|--|
| 31 | J-20A | 6.15.17 Letter to Jackson Re Inquiries re claim |
| 32 | J-20B | 6.15.17 Letter to Jackson Re Inquiries Re Claim |
| 33 | J-21 | System-generated Notes Re Policy Review |
| 34 | J-22 | Complaint |
| 35 | J-23 | Answer and Counterclaim |
| 36 | J-24 | Answer to Counterclaim |
| 37 | P-1 | Term Life Ins Premium Comparison |
| 38 | P-2 | Ledger produced by S. Crum |
| 39 | P-3 | Iowanes Policy Inventory Sheets |
| 40 | P-4 | Viatical Contract dated 8-31-99 |
| 41 | P-5 | Facsimile from Frick to Crum |
| 42 | P-6 | Facsimile re Beneficiary Change |
| 43 | P-7 | Docket Sheet 392-bk-01776 |
| 44 | P-8 | Docket Sheet 93-bk-41843 |
| 45 | P-9 | Attending Physician Statement (filed separately under seal) |
| 46 | P-10 | Cash for Life Application Page |

| <u>Exhibit No.</u> | <u>Admitted Trial Exhibit No.</u> | <u>Description</u> |
|-------------------------------|--|---|
| 47 | P-11 | Lab Reports <i>(filed separately under seal)</i> |
| 48 | P-12 | Policy Document |
| 49 | P-13 | Jantos Legal Invoice |
| 50 | P-14 | Address Change Form |
| 51 | P-16 | Premium Comparison Sheet, Lincoln Financial |
| 52 | P-17 | Policy Data Sheet, Lincoln Financial |
| 53 | P-18 | Application, Lincoln Financial |
| 54 | P-19 | Beneficiary Change Form Lincoln Financial |
| 55 | P-20 | Beneficiary Change Acknowledgement, Lincoln Financial |
| 56 | P-21 | Fax from K. Couch, Lincoln Financial |
| 57 | P-22 | Letter from New England Life Partnership |
| 58 | P-23 | 11-5-18 Frick Letter to L. Zulick |
| 59 | P-24 | Jantos Privilege Log |
| 60 | P-25 | Letter and Docs from The Pye Law Firm (Revised) |
| 61 | P-27 | Cash For Life Docs (MSJ Exh. 9) (Revised) |
| 62 | P-28 | Application Material |

| <u>Exhibit No.</u> | <u>Admitted Trial Exhibit No.</u> | <u>Description</u> |
|-------------------------------|--|-----------------------------|
| 63 | P-29 | Beneficiary Change Material |

Respectfully submitted this 14th day of October, 2020.

MILLER & MARTIN

/s/ Eileen H. Rumfelt

James T. Williams
 Georgia Bar No. 185084
 Eileen Hintz Rumfelt
 eileen.rumfelt@millermartin.com
 Georgia Bar No. 040608
 1180 West Peachtree Street, NW
 Suite 2100
 Atlanta, GA 30309
 Telephone: (404) 962-6100
 Facsimile: (404) 962-6329

- and -

COZEN O'CONNOR
 Michael J. Miller (pro hac vice)
 Michael J. Broadbent (pro hac vice)
 1650 Market Street
 Suite 2800
 Philadelphia, PA 19103
 Telephone: (215) 665-2000
 Facsimile: (212) 665-2013

*Attorneys for Plaintiff, Jackson National Life
 Insurance Company*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the below date I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

This 14th day of October, 2020.

By: /s/ Eileen H. Rumfelt
Eileen H. Rumfelt
Georgia Bar No. 040608